

Exhibit 7

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh
Case No.: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

MILLER COHEN, P.L.C.
Keith D. Flynn (P74192)
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VARNUM LLP
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**DEFENDANT'S SECOND SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT**

NOW COMES the above-named Defendant, HENRY FORD HOSPITAL, by and through its attorneys, VARNUM LLP, and for its Second Supplemental Responses to Plaintiff's First Interrogatories to Defendant, states as follows:

GENERAL OBJECTIONS AND RESERVATIONS

A. Relevance:

Defendant generally objects to each discovery request on the ground that it

SUPPLEMENTAL RESPONSE

See General Objections. Defendant further objects to this Discovery Request because it is overly broad, ambiguous, burdensome and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, Defendant states that it is not aware of any complaints by employees within Henry Ford Medical Laboratories within the last 5 year, other than Plaintiff, for non-payment of time worked during a lunch break.

INTERROGATORY NO 6: Identify all employees terminated within the past five (5) years, and as to each employee identify:

- a. Name;
- b. Job title;
- c. Dates of employment; and
- d. Reason for termination.

RESPONSE:

See General Objections. Defendant further objects to this Discovery Request because it is overly broad, ambiguous, burdensome and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

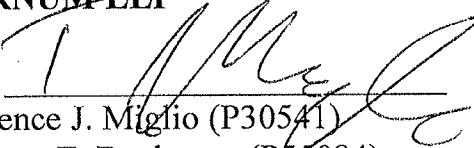
SUPPLEMENTAL RESPONSE:

Without waiving any objections, Defendant states the following employees with Henry Ford Medical Laboratories were terminated for Job Abandonment within the last 5 years:

1. a. Natalie Kristen Reeser; b. Lab Service Rep Outreach; c. 5/16/2011-3/12/2014; d. Job Abandonment.
2. a. Deborah Ann Woodall; b. Lab Assistant; c. 11/19/2012-11/29/2012; d. Job Abandonment.
3. a. Hather Adamo; b. Lab Assistant; c. 1/24/2011-5/6/2011; d. Resigned in Lieu of Termination for Job abandonment.
4. a. Rachel R. Holloman; b. Lab Assistant; c. 11/30/2009-12/21/2010; d. Resigned in Lieu of Termination for Job abandonment. Also falsified records.
5. a. Stephanie Robin Hope; b. Lab Service Rep Outreach; c. 10/8/2012-10/19/2013; d. Resigned in Lieu of Termination for Job abandonment. Also violated cell phone policy.
6. a. Erik Lickteig; b. Lab Service Rep Outreach; c. 7/2/2012-2/22/2013; d. Resigned in Lieu of Termination, for Job Abandonment.
7. a. Shantae Stewart; b. Lab Assistant; c. 9/18/2006-12/7/2012; d. Job Abandonment. Also falsified records.

Respectfully submitted,

VARNUM LLP

By: 

Terrence J. Miglio (P30541)

Barbara E. Buchanan (P55084)

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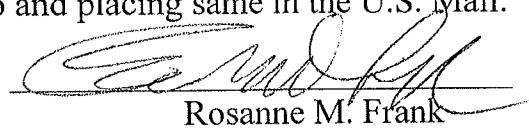
Novi, MI 48375

(248) 567-7400

Dated: December 23, 2014

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December 2014, I caused the foregoing documents to be served upon all parties of record by placing said documents in an envelope with proper postage affixed thereto and placing same in the U.S. Mail.



Rosanne M. Frank